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March 28, 2025

**BY ECF**

Honorable Cheryl L. Pollak  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

Re: Alexandria Holloway v. City of New York, et al.,  
21-CV-3858 (AMD) (CLP)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and am counsel for the defense in the above-referenced matter.

The parties submit this joint status report in accordance with the Court's Order of March 7, 2025 (Dkt. No. 79). Defendants have provided the contested documents, and plaintiff has provided the release for her employment records from Allie Holloway, LLC.

The parties also respectfully propose the following schedule to submit their respective 56.1 statements, and pre-summary judgment motion conference request in accordance with Judge Donnelly's Rules:

1. Rule 56.1 Statements by April 23, 2025;
2. Rule 56.1 Counter-Statements by May 7, 2025; and
3. Pre-Motion Conference Request by May 21, 2025.

Thank you for your consideration herein.

Respectfully submitted,

Joseph M. Hiraoka, Jr. s/

Joseph M. Hiraoka, Jr.  
Senior Counsel  
Special Federal Litigation Division

cc: All Counsel (via ECF)